

**CHRISTIANSEN LAW OFFICES**  
810 S. Casino Center Blvd., Suite 104  
Las Vegas, Nevada 89101  
702-240-7979 • Fax 866-412-6992

PETER S. CHRISTIANSEN, ESQ.  
Nevada Bar No. 5254  
pete@christiansenlaw.com  
KENDELEE L. WORKS, ESQ.  
Nevada Bar No. 9611  
kworks@christiansenlaw.com  
KEELY A. PERDUE, ESQ.  
Nevada Bar No. 13931  
keely@christiansenlaw.com  
CHRISTIANSEN LAW OFFICES  
810 S. Casino Center Blvd., Suite 104  
Las Vegas, Nevada 89101  
Telephone: (702) 240-7979  
Facsimile: (866) 412-6992  
*Attorneys for Defendant Cristiano Ronaldo*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

KATHRYN MAYORGA,  
  
Plaintiff,  
  
vs.  
  
CRISTIANO RONALDO,  
  
Defendant.

Case No. 2:19-cv-00168-JAD-CWH

**DEFENDANT CRISTIANO RONALDO'S  
MOTION FOR LEAVE TO FILE MOTION TO  
DISMISS OR TO COMPEL ARBITRATION IN  
EXCESS OF TWENTY-FOUR PAGES**

Defendant Cristiano Ronaldo, through his undersigned counsel, respectfully moves this Court for leave pursuant to LR 7-3(c) to file an enlarged Motion to Dismiss Kathryn Mayorga's Complaint (ECF No. 1) Pursuant to Fed R. Civ. P. 12(b)(6) or to Compel Arbitration, which exceeds the twenty-four-page limitation set forth in LR7-3(b). The requested enlargement is necessary to thoroughly address Plaintiff's eleven causes of action in her thirty-one-page Complaint and to effectively set forth why Plaintiff's Complaint should be dismissed. Accordingly, Defendant seeks leave to file a forty-six-page Motion. As outlined in the following Declaration of Kendelea L. Works, Esq., good cause exists for the requested enlargement.

///

///

**CHRISTIANSEN LAW OFFICES**  
810 S. Casino Center Blvd., Suite 104  
Las Vegas, Nevada 89101  
702-240-7979 • Fax 866-412-6992

**I.**

**DECLARATION OF KENDELEE L. WORKS, ESQ.**

I, KENDELEE L. WORKS, ESQ., declare as follow:

1. I am an attorney duly licensed and admitted to practice before the courts of the state of Nevada. I am an associate at Christiansen Law Offices and one of the attorneys representing Defendant Cristiano Ronaldo in the above-captioned matter.

2. I make this declaration in support of Defendant's Motion for Leave to File Motion to Dismiss or to Compel Arbitration in Excess of Twenty-Four Pages. Based on my review of the files and records in this case, I have personal knowledge of the contents of this declaration and could testify thereto.

3. Plaintiff filed her thirty-one-page Complaint on January 28, 2019, and the parties have agreed to deem Defendant effectively served. The Complaint contains eleven causes of action, including Battery; Intentional Infliction of Emotional Distress; Coercion and Fraud; Abuse of a Vulnerable Person; Racketeering and Civil Conspiracy; Defamation; Abuse of Process; Declaratory Relief: (1) that the settlement and non-disclosure agreement is void or voidable on the basis of incompetency, undue influence, coercion and/or fraud; (2) that the Plaintiff is excused from performance under the settlement and non-disclosure agreement due to Defendant's breach; Negligence; and Breach of Contract.

4. The complexity and numerosity of the elements underlying Plaintiff's eleven causes of actions and the legal authorities interpreting the same require significant analysis in order to comprehensively address each of the reasons for dismissal.

5. For example, as this Court is aware, the federal and state civil RICO statutes are extremely complex in nature and encompass numerous other claims which require a thorough examination of the law relative to each coupled with an analysis of the particular facts alleged in this case.

6. In order to effectively present Defendant's argument, Declarant must be as thorough as possible and set forth why Plaintiff's Complaint should be dismissed under applicable law. Declarant attempted to perform that analysis and thoroughly brief the issues

1 presented in as few of pages as possible. However, twenty-two (22) additional pages were  
2 required.

3 7. As such, Declarant requests that this Court allow her to exceed the twenty-four-  
4 page limit.

5 8. I declare under penalty of perjury under the laws of the United States of America  
6 that the foregoing facts are true and correct.

7 Executed this 14th day of June, 2019, in Las Vegas, Nevada.

8   
9 KENDELEE L. WORKS, ESQ.


10  
11 **II.**

12 **CONCLUSION**

13 Based on the foregoing, Defendant respectfully requests that this Court permit  
14 Defendant to exceed the twenty-four-page limit mandated by Local Rule 7-3(b).

15 DATED this 14th day of June, 2019.

16 CHRISTIANSEN LAW OFFICES

17   
18 By PETER S. CHRISTIANSEN, ESQ.  
19 KENDELEE L. WORKS, ESQ.  
20 KEELY A. PERDUE, ESQ.  
21 *Attorneys for Defendant Cristiano Ronaldo*  
22  
23  
24  
25  
26  
27  
28

CHRISTIANSEN LAW OFFICES  
810 S. Casino Center Blvd., Suite 104  
Las Vegas, Nevada 89101  
702-240-7979 • Fax 866-412-6992

**CHRISTIANSEN LAW OFFICES**  
810 S. Casino Center Blvd., Suite 104  
Las Vegas, Nevada 89101  
702-240-7979 • Fax 866-412-6992

**CERTIFICATE OF SERVICE**

Pursuant to FRCP 5 and LR-5.1, I certify that I am an employee of CHRISTIANSEN LAW OFFICES, and that on this 14th day of June, 2019, I caused the foregoing document entitled **DEFENDANT CRISTIANO RONALDO'S MOTION FOR LEAVE TO FILE MOTION TO DISMISS OR TO COMPEL ARBITRATION IN EXCESS OF TWENTY-FOUR PAGES** to be filed and served via the Court's CM/ECF electronic filing system upon all registered parties and their counsel.



---